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Plaintiff's Counsel*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SANDRA M. MEZA-PEREZ, an individual,  
  
Plaintiff,

v.

SBARRO LLC dba SBARRO PIZZA, a foreign  
limited liability company; SBARRO, INC. dba  
SBARRO PIZZA, a foreign corporation;  
ZACHARY CEBALLES, and individual;  
EFRAIN HERNANDEZ, an individual; JESUS  
ALATORRE, an individual; DANA DORADO,  
an individual,  
  
Defendants.

CASE NO. 2:19-cv-373-APG-NJK

**STIPULATION AND  
ORDER TO EXTEND TIME (3<sup>rd</sup>  
REQUEST) TO FILE OPPOSITION AND  
REPLY ON MOTION FOR SANCTIONS  
UNDER 28 U.S.C. §1927 AND THE  
COURT'S INHERENT POWERS BY  
DANA DORADO (DOCKET NO. 122)**

The parties herein, by and through their attorneys of record, hereby stipulate and agree to the following:

1. On January 22, 2020, Mark. E. Ferrario, Esq. and Jason K. Hicks, Esq. of Greenberg Traurig, LLP, attorneys for Dana Dorado, ("Movant") filed a Motion for Sanctions against Melanie Hill and Hardeep Sull, as counsel for Plaintiff Sandra Meza-Perez, pursuant to 28 U.S.C. §1927 and the Court's inherent powers [ECF No. 122] ("Motion").

2. On February 2, 2020, Plaintiff Sandra M. Meza-Perez, Hardeep Sull, Esq. and Melanie Hill, Esq. filed a Motion for Extension of Time to File Response to Dismissed Defendant Dana Dorado's Motion for Sanctions Under 28 U.S.C. §1927 and the Court's Inherent Powers, First Request [ECF No. 124].

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1           3.       On February 3, 2020, the Honorable Judge Andrew P. Gordon granted the  
2 Motion to Extend Time, and allowed the Response to Motion for Sanctions due by  
3 March 6, 2020.

4           4.       On March 6, 2020, Joseph P. Garin, Esq. of Lipson Neilson P.C., filed  
5 Notice of Limited Appearance to represent and defend Melanie Hill and Hardeep Sull in  
6 the said Motion and at any oral argument thereon that may be granted by the Honorable  
7 Court.

8           5.       On March 6, 2020, this Court permitted a second extension to respond to  
9 the Motion for Sanctions (ECF No. 130).

10          6.       This stipulation is being entered into based on the representations  
11 contained in the motion (ECF No. 135) and to accommodate the schedules of counsel  
12 for the parties due to general disruptions arising from COVID19 emergency otherwise  
13 accommodate the schedules of counsel for the parties.

14          7.       Given the forgoing, the parties herein agree to extend the deadline for  
15 Melanie Hill and Hardeep Sull to file their Opposition to the Motion up to **April 13, 2020**.

16          8.       Thereafter, Movant shall have up to and until **May 11, 2020** within which to  
17 submit her Reply.

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9. This stipulation is submitted based upon good cause, and is not made for the purpose of delay.

Dated this 27<sup>th</sup> day of March, 2020

Dated 27<sup>th</sup> day of March, 2020

GREENBERG TRAURIG, LLP

LIPSON NEILSON P.C.

/s/ Jason K. Hicks

/s/ Joseph P. Garin

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Plaintiff's Counsel*

**ORDER**

IT IS SO ORDERED.

Dated: April 16, 2020.

  
UNITED STATES DISTRICT COURT JUDGE